

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
DIVISION

2014 DEC 31 AM 11:13

Robert L. Ogletree, JR

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN

Name of Plaintiff(s)

v.

James Vandeveer

Rutherford County

Sheriff Office

Name of Defendant(s)

Case No. _____

(To be assigned by Clerk)

COMPLAINT

1. State the grounds for filing this case in Federal Court (include federal statutes and/or U. S. Constitutional provisions, if you know them):

1982 lawsuit packet

2. Plaintiff, Robert L. Ogletree resides at
610 NW Broad St., Murfreesboro,
Street address City
Rutherford, TN, 37129, 615-809-6577.
County State Zip Code Telephone Number

(If more than one plaintiff, provide the same information for each plaintiff below.)

N/A

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3. Defendant, Deputy James Vander veer resides at
940 New Salem Road, Murfreesboro,
Street address City
Rutherford, TN, 37129, 615-809-6577,
County State Zip Code Telephone Number

(If more than one defendant, provide the same information for each defendant below.)

N/A

4. Statement of claim. (State as briefly as possible, the facts of your case. Describe how each Defendant is involved. Include also the names of other persons involved, dates, and places. Be as specific as possible. You may use additional paper if necessary. Attach any documentation or exhibits in support of the complaint):

10-27-2013 Deputy James Vander Veer Pepper sprayed Robert L. Ogletree, JR, as he sat with his legs crossed. Deputy James Vander Veer was standing on the other side of a door with the flap down. Plaintiff will show that Robert L. Ogletree, JR was not resisting, Estate of Booker V. Gomez #12-1496, 745 F3d 405 (10th Cir. 2014) Plaintiff will show and prove that Deputy James Vander Veer, act of assault was repugnant to the conscience of Mark Kind-Hagan v. Fischer, #12-4246, 2013

5. Prayers for Relief (List what you want to Court to do):

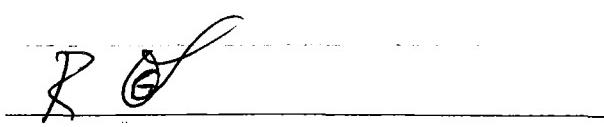
a. 225,000 in compensatory damages
226,000 in punitive damages
Degorski v. Wilson #104-ev

b. _____

c. _____

d. _____

I (We) hereby certify under penalty of perjury that the above Petition is true to the best of my (our) information, knowledge, and belief.

Signed this _____ day of _____, 20 _____.


(Signature of Plaintiff(s))

U.S. lexis 25 337 (2nd cir) Plaintiff will also show that James Vanderveer violated a clearly established law. Roberson v. Torres; 13-1405, 77 F. 392 (6th cir. 2014) Plaintiff will also show that Deputy James Vanderveer deprived Robert L. Ogletree, JR. The right to be free from cruel and unusual punishment. Violating Robert L. Ogletree, JR constitutional rights. Plaintiff will show that his vision has been effected from being sprayed by Deputy James Vanderveer with pepper spray. Plaintiff will show that Deputy James Vanderveer knew that the use of force posed a risk of harm to the Plaintiff, but that he recklessly disregarded his safety. Kingsley V. Herdrickson #12-3638, 2014 U.S. App lexis 3972 (7th cir) Plaintiff will show that Deputy James Vanderveer is not entitled to qualified immunity. Edwards V. Byrd # 13-1560 (2014 U.S App lexis 7670 8th cir) Plaintiff will show that Deputy James Vanderveer violated the protections of the constitution. Turner V. Safley 482-U.S-7889

Respectfully; submitted,

Robert L. Ogletree, JR

R.O.